

FILED
JAN 02 2025
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
Western Division**

VENICE SMALL

Plaintiff,

v.

**LIBERTY MUTUAL PERSONAL
INSURANCE COMPANY**

Defendant and Counterclaimant.

* Case No.: 3:24-cv-00007-JZ
*
* Judge: JACK ZOUHARY
*
* **Affidavit of disqualification for cause**
* **Against Judge Jack Zouhary [28 U.S.C.**
* **455, Judicial Canon 2.1 under the**
* **constitution]**
*
* E-Mail: vee2019smalls@gmail.com
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* Plaintiff
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Now comes Venice Small the Plaintiff pro se. I demand (defacto) Judge Jack Zouhary to do his ministerial duty to abide by his oath of office and the United States Constitution, to abide by the ABA Rule 2.11 A(1)(d) disqualification for bias and prejudice and abuse of power, Which also violate plaintiff constitutional rights to due process. Plaintiff Venice Small is a homeowner of 9 Magyar first person in family to own property remodel this property from top to bottom and presided there . AUGUST, 8TH ,2021 This property caught

fire no human set fire the Toledo fire department investigation stated took oath that no human set fire to the residents. 100 true facts cant be disputed and prepared to tell a jury the same .Total loss plaintiff whole life was in this property! The courts has allowed the defendant attorneys to continue to get paid off my trauma for years liberty mutual has delayed, denied, and defended this case. I have all the proof as shown here why Since Plaintiff became pro se Judge Jack Zouhary abuse it power for Defendant See attached order December, 18,2024 Exhibit A. Judge Jack Zouhary abuse his power to order Plaintiff Venice Small to sign document authorizations off the record by way of the courts legal clerk which Plaintiff denied. This is after a all party conference call held on tax forms and deed that's it see order Exhibit B-2. Defendant already had in possession see authorization Exhibit C signed February,1,2022 available for 12 months all results are supposed to be used for trial proceedings and deposition purposes this is why im suing. Also signed by Plaintiff also see Exhibit D-1 (H 1-5)Boost Mobile Consent authorization and results from a federal judge in Arizona for cell locations and text messages and phone calls. Reminder im suing this company about these same documents in question they said they never received which is false. I sent documents per order Dec, 18th, 2024 . Why would Judge Jack Zouhary order plaintiff to sign another authorization after plaintiff present concrete evidence a authorization was signed February 1st, 2022 a honorable judge would question this but a bias judge would disregard it. The results are supposed to be used from the Authorization signed on February 1st 2022 and it results from it was supposed to be given to the Plaintiff upon request. See order on Dec,18th 2024 this order wasn't about facts it's a federal judge saying im in power and I do what I want similar to a slave master mentality not I took a other for the American people mentality reminder someone been

homeless for almost 4year and it was purposely done and facts to prove it. See Exhibit D - 2 defendant response to Judge Jack Zouhary authorization results could not be used but denied plaintiff claim April ,15,2022 which is bad faith this is a lawsuit im suing about which the judge denied. Also defendant said in march ,21,2022 Toledo Edison was only company that would not honor authorization See exhibit D-2 , this is fact not testimony. A honorable judge would question defendant about this But a bias judge would disregard this .Judge Jack Zouhary has knowledge of this. Every time plaintiff calls defendant out for dirty play the Judge get frustrated with plaintiff. My attorney Dennis sawan spent months begging the defendant for the results of this February 1st 2022, authorizations results and steps it to took to exonerate plaintiff see Exhibit P. This facts physical evidence. Defendant ignored plaintiff and denied claim April,15,2022. Judge Jack Zouhary has knowledge of this for months defendant denied us access that is bad faith. Any evidence to exonerate plaintiff the defendant has withheld or lied about it and the courts has knowledge of this just recently on the record a audio by Defendant experts very important information on this audio which has now been deleted and alter was Withheld for 3 year and 4 months this the courts has knowledge of this. also all blacked-out redacted copies I've been requested see exhibit B the court was supposed to review still hasn't. But Judge Jack Zouhary abuse it power on a order Dec,18th,2024 for documentation plaintiff already signed February, 1,2022 and was good for a whole year and defendant was to take that information and use it for trial purposes deposition purposes its supposed to be evidence .Defendant already has denied Plaintiff's Claim without dudilgent left Plaintiff homeless for 3 years and 5 months this is genocide this affect millions especially the African Americans. You would think a Judge would be livid about a company doing client in this matter. Dec 2024 defendant

admit to the courts they didn't have everything from authorization in feb,1,2022 see Exhibit F. Instead of the Judge Jack Zouhary asking Defendant why did you deny plaintiff claim without acknowledge of this information and plaintiff counsel asked Defendant for months. So Judge Jack Zouhary abuse it power to let them start a investigation while plaintiff is suing defendant that is Ludacris with these documents in question with lawsuit which makes the court a witness. ABA. 2.11 A (1) (d). Attorney Jeffrey Zilba told me Plaintiff Venice Small that Judge Jack Zouhary told him that I Plaintiff Venice Small pro se who is African " that illiterate nigger isn't going to win this case" . I Venice small was not present when this statement was announced. But why would Jeff Zilba say that and the judge really showed it threw action. But throughout the recent months since Plaintiff been pro se he feels the court views him as such and the courts action say the same in its Dec, 18th 2024 order show its abuse it power for the Defendant which is cause for disqualification and be recuse under ABA 2.11. Defendant is corrupt and this is corruption at its core next defendant is going to manipulate and say im not cooperating since August, with authorizations im suing this company about. Judge Jack Zouhary took a constitutional oath but disregard the obvious facts and the law in this order and is showing pure examples why I see the courts is bias and abuse power for Defendant and see A.B.A 2.11 A(1)(d) recuse and disqualification and violation of plaintiff constitutional rights to due process . I see order of December,18,2024 be vacated immediately.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was sent via. Email, via Mail on this 30th day of Dec 2024.

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Venice small